

D. 911, E911, Directory Assistance, and Operator Call-Completion Services (Checklist Item 7).

911 and E911. Verizon provides competing carriers in New Hampshire and Delaware with nondiscriminatory access to E911 services and databases under approved interconnection agreements using the same checklist-compliant processes and procedures that it uses in its New England states and Pennsylvania, respectively. See Lacouture/Ruesterholz NH Decl. ¶ 287; Lacouture/Ruesterholz DE Decl. ¶ 278; Massachusetts Order ¶ 222 (finding that Verizon's provision of E911 satisfies the Act); Pennsylvania Order ¶ 120 (same); Rhode Island Order ¶ 97 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52 (same); see also New Jersey Order ¶ 164. Through March 2002, CLECs with their own switches have obtained approximately 104,000 E911 subscriber listings in New Hampshire and approximately 33,000 such listings in Delaware. See Lacouture/Ruesterholz NH Decl. ¶ 302; Lacouture/Ruesterholz DE Decl. ¶ 292.

CLECs that have their own switches make their own entries in the E911 database using an electronic interface that gives them the same ability as Verizon to input information. See Lacouture/Ruesterholz NH Decl. ¶ 295; Lacouture/Ruesterholz DE Decl. ¶ 285. In addition, through March 2002, Verizon has provided more than 130 E911 trunks to 12 CLECs in New Hampshire in order to establish connections to Verizon's E911 tandems. See Lacouture/Ruesterholz NH Decl. ¶ 293. Verizon also is making interconnection available to CLECs at each of its two E911 tandems in Delaware, although Verizon does not separately track the number of trunks used for that purpose. See Lacouture/Ruesterholz DE Decl. ¶ 283.

Verizon provides competing carriers with E911 trunks on a timely basis, within the same standard intervals as for interconnection trunks generally. See Lacouture/Ruesterholz NH Decl. ¶ 292; Lacouture/Ruesterholz DE Decl. ¶ 282. Moreover, for a competing carrier without its own switch, Verizon will enter all the necessary E911 data for that carrier's customers in exactly

the same way that Verizon enters its own customer data. See Lacouture/Ruesterholz NH Decl. ¶¶ 296-297; Lacouture/Ruesterholz DE Decl. ¶¶ 286-287. Verizon also commingles CLECs' E911 database entries with Verizon's own entries to ensure that they are maintained with the same accuracy and reliability that Verizon maintains for its own retail customers. See Lacouture/Ruesterholz NH Decl. ¶ 298; Lacouture/Ruesterholz DE Decl. ¶ 288.

Directory Assistance. Verizon provides directory assistance services in New Hampshire and Delaware in the same way that it does in its New England states and Pennsylvania, respectively. See Lacouture/Ruesterholz NH Decl. ¶ 303; Lacouture/Ruesterholz DE Decl. ¶ 293; Massachusetts Order ¶ 222 (finding that Verizon's provision of directory assistance satisfies the Act); Pennsylvania Order ¶ 120 (same); Rhode Island Order ¶ 97 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52 (same); see also New Jersey Order ¶ 164. Competing carriers have the option of purchasing directory assistance directly from Verizon, or they can rely on their own directory assistance centers and use Verizon's or a third party's directory assistance database. See Lacouture/Ruesterholz NH Decl. ¶ 304; Lacouture/Ruesterholz DE Decl. ¶ 294.⁵⁴

Through March 2002, in New Hampshire, eight carriers were purchasing directory assistance services from Verizon using approximately 330 dedicated OS/DA trunks, and another 32 competing carriers were purchasing directory assistance service using shared transport. See Lacouture/Ruesterholz NH Decl. ¶ 305. As of that same date, five CLECs in Delaware were purchasing directory assistance from Verizon using approximately 30 dedicated OS/DA trunks,

⁵⁴ For CLECs that establish their own directory assistance centers, Verizon provides nondiscriminatory access to its directory assistance listings. See Lacouture/Ruesterholz NH Decl. ¶ 310; Lacouture/Ruesterholz DE Decl. ¶ 300. Verizon allows CLECs to use Direct Access to Directory Assistance, a database service that provides read-only access to Verizon's directory assistance listings. See Lacouture/Ruesterholz NH Decl. ¶ 310; Lacouture/Ruesterholz DE Decl. ¶ 300. Verizon also makes the contents of its directory assistance database available to CLECs in an electronic format for their use in providing local directory assistance services. See Lacouture/Ruesterholz NH Decl. ¶ 311; Lacouture/Ruesterholz DE Decl. ¶ 301.

and another 29 CLECs were purchasing directory assistance service using shared transport. See Lacouture/Ruesterholz DE Decl. ¶ 295.

In both New Hampshire and in Delaware, Verizon provides trunks to competing carriers for directory assistance in the same manner it provides interconnection trunks generally. See Lacouture/Ruesterholz NH Decl. ¶ 306; Lacouture/Ruesterholz DE Decl. ¶ 296. Moreover, when CLECs purchase Verizon's directory assistance services, they have their choice of branding options,⁵⁵ and calls from CLEC customers are handled in a nondiscriminatory fashion and answered as quickly as calls from Verizon's own customers. See Lacouture/Ruesterholz NH Decl. ¶ 313; Lacouture/Ruesterholz DE Decl. ¶ 303.

Operator Services. Verizon likewise provides access to its operator services in New Hampshire and Delaware using the same processes and procedures that it uses in its 271-approved New England states and Pennsylvania, respectively. See Lacouture/Ruesterholz NH Decl. ¶ 314; Lacouture/Ruesterholz DE Decl. ¶ 305; Massachusetts Order ¶ 222 (finding that Verizon's provision of operator services satisfies the Act); Pennsylvania Order ¶ 120 (same); Rhode Island Order ¶ 97 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52 (same); see also New Jersey Order ¶ 164. Competing carriers again have the option either to purchase operator services from Verizon or to rely on their own centers. See Lacouture/Ruesterholz NH Decl. ¶ 315; Lacouture/Ruesterholz DE Decl. ¶ 306.

As of March 2002, eight facilities-based CLECs were purchasing operator services from Verizon in New Hampshire using approximately 330 dedicated OS/DA trunks. See Lacouture/Ruesterholz NH Decl. ¶ 317. In Delaware, as of that same date, five facilities-based

⁵⁵ Verizon permits CLECs that purchase Verizon's directory assistance services to order such services "unbranded," "rebranded," or with a Verizon brand. See Lacouture/Ruesterholz NH Decl. ¶ 309; Lacouture/Ruesterholz DE Decl. ¶ 299.

CLECs were purchasing operator services using approximately 30 dedicated OS/DA trunks. See Lacouture/Ruesterholz DE Decl. ¶ 308. Another 32 CLECs in New Hampshire and 29 CLECs in Delaware were purchasing operator services using shared transport. See Lacouture/Ruesterholz NH Decl. ¶ 317; Lacouture/Ruesterholz DE Decl. ¶ 308.

As with directory assistance, Verizon provides trunks to competing carriers that provide their own operator services in the same time and manner and in the same intervals as it provides interconnection trunks generally. See Lacouture/Ruesterholz NH Decl. ¶ 318; Lacouture/Ruesterholz DE Decl. ¶ 309. Moreover, when CLECs purchase Verizon's operator services, they have their choice of branding options, and Verizon's performance in handling calls from CLEC customers in a timely manner is even better than the standards established in the Carrier-to-Carrier guidelines. See Lacouture/Ruesterholz NH Decl. ¶¶ 320-322; Lacouture/Ruesterholz DE Decl. ¶¶ 311-313.

E. White Pages Directory Listings (Checklist Item 8).

Verizon provides access to its white pages directory listings in New Hampshire and Delaware in the same manner as it does in its New England states and Pennsylvania, respectively. See Lacouture/Ruesterholz NH Decl. ¶ 323; Lacouture/Ruesterholz DE Decl. ¶ 315; Massachusetts Order ¶ 222 (finding that Verizon's provision of white pages directory listings satisfies the checklist); Pennsylvania Order ¶¶ 114-117 (same); Rhode Island Order ¶ 97 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52 (same); see also New Jersey Order ¶ 156.

Competing carriers in New Hampshire and Delaware use Verizon's white pages directory listings extensively: through March 2002, Verizon had provided competing carriers in New Hampshire with more than 56,500 basic white pages directory listings, including more than

40,000 for residential customers. See Lacouture/Ruesterholz NH Decl. ¶ 333.⁵⁶ As of that same date, Verizon had provided competing carriers in Delaware with more than 33,000 basic white pages directory listings, including 18,000 for residential customers. See Lacouture/Ruesterholz DE Decl. ¶ 325. Moreover, Verizon has procedures in place to ensure that the directory listings of CLEC customers are included in Verizon's database on an accurate, reliable, and nondiscriminatory basis. See Lacouture/Ruesterholz NH Decl. ¶¶ 325-329, 334; Lacouture/Ruesterholz DE Decl. ¶¶ 317-321, 326.⁵⁷ In fact, Verizon provides CLECs in both New Hampshire and Delaware with several means of verifying their customers' listings prior to publication. See Lacouture/Ruesterholz NH Decl. ¶¶ 335-337; Lacouture/Ruesterholz DE Decl. ¶¶ 327-329. These include a listings verification report that Verizon provides prior to the service order close date; the ability to review published listings in real time through a Web GUI; and an electronic confirmation of the information entered on a CLEC's listing service request. See Lacouture/Ruesterholz NH Decl. ¶¶ 335-337; Lacouture/Ruesterholz DE Decl. ¶¶ 327-329.

Finally, Verizon ensures that listings are not inadvertently dropped when a customer switches to a competing carrier. See Lacouture/Ruesterholz NH Decl. ¶ 338; Lacouture/Ruesterholz DE Decl. ¶ 326. For a customer that switches from Verizon to a competing carrier's resale service or UNE-platform service, Verizon does not first disconnect that customer's Verizon service and, therefore, does not even distribute that order to the systems

⁵⁶ Verizon provides white pages directory listings under interconnection agreements and its SGAT in New Hampshire, and under interconnection agreements in Delaware. See Lacouture/Ruesterholz NH Decl. ¶ 324; Lacouture/Ruesterholz DE Decl. ¶ 316.

⁵⁷ For example, Verizon commingles the listings of CLECs' customers alphabetically with Verizon's own customers, using the same typeface and format and with no distinguishing features. See Lacouture/Ruesterholz NH Decl. ¶ 325; Lacouture/Ruesterholz DE Decl. ¶ 317. Verizon enters CLECs' listings using the same procedures as for its own listings. See Lacouture/Ruesterholz NH Decl. ¶ 326; Lacouture/Ruesterholz DE Decl. ¶ 318.

that are used to modify or delete directory listings. See Lacouture/Ruesterholz NH Decl. ¶ 338; Lacouture/Ruesterholz DE Decl. ¶ 326.

F. Number Administration (Checklist Item 9).

Verizon is no longer responsible for assigning telephone numbers either to itself or to competing carriers in either New Hampshire or in Delaware: NeuStar has assumed responsibility as the North American Numbering Plan Administrator. See Lacouture/Ruesterholz NH Decl. ¶ 340; Lacouture/Ruesterholz DE Decl. ¶ 330. Through March 2002, approximately 1.7 million telephone numbers have been assigned to CLECs in New Hampshire, and approximately 1.9 million telephone numbers have been assigned to CLECs in Delaware. See Lacouture/Ruesterholz NH Decl. ¶ 341; Lacouture/Ruesterholz DE Decl. ¶ 331. As in Verizon's 271-approved states, Verizon ensures accurate and complete programming of CLEC telephone numbers in its switches in New Hampshire and Delaware and installs new telephone numbers for CLECs in accordance with the procedures in the Central Office Code Assignment Guidelines. See Lacouture/Ruesterholz NH Decl. ¶¶ 342-343; Lacouture/Ruesterholz DE Decl. ¶¶ 332-333. Verizon also conducts a monthly comparison of the information in its own internal Code Administration System with the information in the Local Exchange Routing Guide to ensure that Verizon's information is accurate. See Lacouture/Ruesterholz NH Decl. ¶ 344; Lacouture/Ruesterholz DE Decl. ¶ 334.

G. Databases and Associated Signaling (Checklist Item 10).

Verizon provides competing carriers in New Hampshire and Delaware with access to its databases and signaling using the same nondiscriminatory processes and procedures that it uses in its New England states and Pennsylvania, respectively. See Lacouture/Ruesterholz NH Decl. ¶ 346; Lacouture/Ruesterholz DE Decl. ¶ 335; Massachusetts Order ¶ 222 (finding that Verizon's provision of databases and signaling satisfies the checklist); Pennsylvania Order ¶ 120

(same); Rhode Island Order ¶ 97 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52 (same); see also New Jersey Order ¶ 164.⁵⁸

Through March 2002, Verizon was providing three CLECs in New Hampshire and ten CLECs in Delaware with access to its SS7 signaling network through its federal access tariff offering, although no CLEC has requested unbundled access to Verizon's signaling network in either state. See Lacouture/Ruesterholz NH Decl. ¶ 350; Lacouture/Ruesterholz DE Decl. ¶ 339. Verizon also provides CLECs in both states with access to its Toll Free, Line Information, and Calling Name databases. See Lacouture/Ruesterholz NH Decl. ¶¶ 353, 356, 361; Lacouture/Ruesterholz DE Decl. ¶¶ 342, 345, 350. In 2001, Verizon processed more than 300 million queries for its Toll Free database in New Hampshire and more than 210 million such queries in Delaware; approximately 39 million queries for its Line Information database in New England and approximately 153 million such queries in the former Bell Atlantic South States (Delaware, Pennsylvania, New Jersey, Maryland, Virginia, West Virginia, and the District of Columbia); and approximately 307 million queries for its Calling Name databases in New England and approximately 794 million such queries in the former Bell Atlantic South states. See Lacouture/Ruesterholz NH Decl. ¶¶ 354, 358, 362; Lacouture/Ruesterholz DE Decl. ¶¶ 343, 347, 351. In addition, as of March 2002, ten CLECs in New Hampshire and seven in Delaware

⁵⁸ Verizon provides access to signaling and databases under agreements and its SGAT in New Hampshire, and under agreements in Delaware. See Lacouture/Ruesterholz NH Decl. ¶¶ 347, 353, 356, 361, 365, 368; Lacouture/Ruesterholz DE Decl. ¶¶ 336, 342, 345, 350, 354, 357. With respect to signaling, Verizon uses the same facilities, equipment, and personnel to provision signaling links for CLECs and itself. See Lacouture/Ruesterholz NH Decl. ¶ 352; Lacouture/Ruesterholz DE Decl. ¶ 341. And all signaling traffic on Verizon's network is queued and routed on a nondiscriminatory basis. See Lacouture/Ruesterholz NH Decl. ¶ 352; Lacouture/Ruesterholz DE Decl. ¶ 341. With respect to databases, Verizon adds information for CLEC customers to its databases in the same manner as for Verizon's own customers, and CLEC queries to the databases are commingled with Verizon's own queries and processed on a first-come, first-served basis. See Lacouture/Ruesterholz NH Decl. ¶¶ 355, 359, 363, 367; Lacouture/Ruesterholz DE Decl. ¶¶ 344, 348, 352, 356.

were using Verizon's Local Number Portability database. See Lacouture/Ruesterholz NH Decl. ¶ 366; Lacouture/Ruesterholz DE Decl. ¶ 355.

As in Verizon's 271-approved states, Verizon also provides competing carriers in New Hampshire and Delaware with access to its Service Management System database, which enables competitors to enter, modify, or delete entries in Verizon's call-related databases. See Lacouture/Ruesterholz NH Decl. ¶ 368; Lacouture/Ruesterholz DE Decl. ¶ 357. In addition, CLECs may obtain access to Verizon's Service Management System/Service Creation Environment, which enables them to create and test their own Advanced Intelligent Network ("AIN")-based telecommunications services. See Lacouture/Ruesterholz NH Decl. ¶ 369; Lacouture/Ruesterholz DE Decl. ¶ 358.

H. Number Portability (Checklist Item 11).

Verizon has implemented long-term number portability ("LNP") in all of its end offices both in New Hampshire and in Delaware. See Lacouture/Ruesterholz NH Decl. ¶ 373; Lacouture/Ruesterholz DE Decl. ¶ 362. Verizon uses the same processes and procedures to provide number portability in New Hampshire and Delaware as it uses in its New England States and Pennsylvania, respectively. See Lacouture/Ruesterholz NH Decl. ¶ 372; Lacouture/Ruesterholz DE Decl. ¶ 361; Massachusetts Order ¶ 222 (finding that Verizon's provision of number portability satisfies the checklist); Pennsylvania Order ¶ 120 (same); Rhode Island Order ¶ 97 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52; see also New Jersey Order ¶ 164.⁵⁹ Through March 2002, Verizon provided 13 CLECs in New Hampshire with LNP on approximately 80,000 telephone numbers. See Lacouture/Ruesterholz NH Decl. ¶ 374. As of

⁵⁹ Verizon provides LNP under interconnection agreements and its SGAT in New Hampshire, and under interconnection agreements in Delaware. See Lacouture/Ruesterholz NH Decl. ¶ 372; Lacouture/Ruesterholz DE Decl. ¶ 361.

that same date, Verizon provided nine CLECs in Delaware with LNP on approximately 103,000 telephone numbers. See Lacouture/Ruesterholz DE Decl. ¶ 363.⁶⁰ In New Hampshire, from February through April, Verizon met the due date on more than 99 percent of the orders for LNP that were performed on a stand-alone basis, and more than 98 percent of the LNP orders that were performed in conjunction with hot cuts. See Lacouture/Ruesterholz NH Decl. ¶ 375. In Delaware, during that same period, Verizon missed only four LNP requests on a stand-alone basis, and met the due date for more than 98 percent of LNP orders that were performed in conjunction with hot cuts. See Lacouture/Ruesterholz DE Decl. ¶ 364. Verizon's performance also was at similarly high levels in Massachusetts and Pennsylvania, where volumes are higher. See Lacouture/Ruesterholz NH Decl. ¶ 376; Lacouture/Ruesterholz DE Decl. ¶ 365.

I. Local Dialing Parity (Checklist Item 12).

Verizon provides local dialing parity throughout its service areas in New Hampshire and Delaware using substantially the same processes and procedures as in its New England states and Pennsylvania, respectively. See Lacouture/Ruesterholz NH Decl. ¶ 378; Lacouture/Ruesterholz DE Decl. ¶ 366; Massachusetts Order ¶ 222 (finding that Verizon's provision of local dialing parity satisfies the checklist); Pennsylvania Order ¶ 120 (same); Rhode Island Order ¶ 97 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52 (same); see also New Jersey Order ¶ 164.⁶¹ In

⁶⁰ Verizon also continues to maintain interim number portability ("INP") capabilities for CLECs, though it is no longer taking orders for INP. See Lacouture/Ruesterholz NH Decl. ¶ 373; Lacouture/Ruesterholz DE Decl. ¶ 362. Where CLECs have existing INP arrangements, Verizon is converting those arrangements to LNP on a mutually agreed-upon schedule. See id.; see also New Hampshire 271 Approval Letter at 2 (noting that Verizon has agreed to the PUC's condition to convert all interim number portability arrangements to permanent number portability, including those historical arrangements that CLECs have not previously requested be converted). Through March 2002, Verizon continues to provide INP on approximately 115 telephone numbers in New Hampshire and 55 in Delaware. See Lacouture/Ruesterholz NH Decl. ¶ 373; Lacouture/Ruesterholz DE Decl. ¶ 362.

⁶¹ Verizon provides dialing parity under interconnection agreements and its SGAT in

both New Hampshire and Delaware, once local calls from competing carriers reach Verizon's network, they are treated the same as any call that originates on Verizon's own network. See Lacouture/Ruesterholz NH Decl. ¶ 379; Lacouture/Ruesterholz DE Decl. ¶ 367. Accordingly, no differences exist in dialing delays, call completion, or transmission quality between calls made by CLECs' customers and calls made by Verizon's customers. See Lacouture/Ruesterholz NH Decl. ¶ 379; Lacouture/Ruesterholz DE Decl. ¶ 367. In 2001, Verizon exchanged approximately 4.5 billion minutes of traffic with CLECs in New Hampshire and approximately 2.9 billion minutes of traffic with CLECs in Delaware over local interconnection trunks on calls that were completed with dialing parity. See Lacouture/Ruesterholz NH Decl. ¶ 382; Lacouture/Ruesterholz DE Decl. ¶ 370. In addition, while intraLATA toll dialing parity is not a checklist requirement, Verizon has implemented intraLATA toll dialing parity in New Hampshire and Delaware pursuant to the requirements of the state commissions in those states. See Lacouture/Ruesterholz NH Decl. ¶ 383; Lacouture/Ruesterholz DE Decl. ¶ 371.

J. Reciprocal Compensation (Checklist Item 13).

Verizon is providing reciprocal compensation for transportation and termination of local calls to competing carriers in New Hampshire and Delaware. See Lacouture/Ruesterholz NH Decl. ¶ 384; Lacouture/Ruesterholz DE Decl. ¶ 372. As of March 2002, Verizon was paying reciprocal compensation to some 12 CLECs, nine cellular providers, and three paging companies in New Hampshire. See Lacouture/Ruesterholz NH Decl. ¶ 386.⁶² As of that same date, Verizon

New Hampshire, and under interconnection agreements in Delaware. See Lacouture/Ruesterholz NH Decl. ¶ 381; Lacouture/Ruesterholz DE Decl. ¶ 369.

⁶² The Commission has found that intercarrier compensation for Internet-bound traffic is not subject to 47 U.S.C. § 251(b)(5), which means that compensation for such traffic is not an issue under the checklist. See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Intercarrier Compensation for ISP-Bound Traffic, Order on Remand and Report and Order, 16 FCC Rcd 9151 (2001), remanded, WorldCom, Inc. v. FCC,

was paying reciprocal compensation to some eight CLECs, six cellular providers, and eight paging companies in Delaware. See Lacouture/Ruesterholz DE Decl. ¶ 374.

K. Resale (Checklist Item 14).

In both New Hampshire and in Delaware, Verizon makes available for resale at wholesale rates established by the state commissions in those states all of the telecommunications services that Verizon offers at retail to subscribers that are not telecommunications carriers. See Lacouture/Ruesterholz NH Decl. ¶ 388; Lacouture/Ruesterholz DE Decl. ¶ 376.⁶³ In New Hampshire, Verizon makes services available for resale in the same manner and using the same processes and procedures as in Massachusetts, Rhode Island, Vermont, and Maine see Lacouture/Ruesterholz NH Decl. ¶ 388, where the Commission found that Verizon satisfies the checklist, see Massachusetts Order ¶¶ 217-221; Rhode Island Order ¶ 94; Vermont Order ¶ 59; Maine Order ¶ 52. In Delaware, Verizon makes services available for resale in the same manner and using the same processes and procedures as in Pennsylvania, see Lacouture/Ruesterholz NH Decl. ¶ 376, where the Commission likewise found that Verizon satisfies the checklist, see Pennsylvania Order ¶¶ 93-95; see also New Jersey Order ¶ 161. Through March 2002, Verizon has provided approximately 34,000 resold lines in New Hampshire, including approximately 33,000 business lines and approximately 1,100

288 F.3d 429 (D.C. Cir. 2002); 47 U.S.C. § 271(c)(2)(B)(xiii); id. § 252(d)(2); Pennsylvania Order ¶ 119; Connecticut Order ¶ 67; Massachusetts Order ¶ 215; Kansas/Oklahoma Order ¶ 251.

⁶³ Verizon is making available services for resale under interconnection agreements and its SGAT in New Hampshire, and under interconnection agreements in Delaware. See Lacouture/Ruesterholz NH Decl. ¶ 388; Lacouture/Ruesterholz DE Decl. ¶ 376. The New Hampshire PUC established the following wholesale discounts: 19.04 percent for residential lines and 20.25 percent for business lines with Verizon's OS/DA; and 17.30 percent for residential lines and 18.78 percent for business lines without these features. See Hickey/Garzillo/Anglin Decl. ¶ 57. The Delaware PSC established the following wholesale discounts: 16 percent for residential and business lines with Verizon's OS/DA; and 20 percent for residential and business lines without these features. See Martin/Garzillo/Sanford Decl. ¶ 73.

residential lines. See Lacouture/Ruesterholz NH Decl. ¶ 389. As of that same date, Verizon has provided approximately 13,400 resold lines in Delaware, including approximately 8,700 business lines and approximately 4,700 residential lines. See Lacouture/Ruesterholz DE Decl. ¶ 377.

Verizon provides services for resale on time, when CLECs request them. In New Hampshire, from February through April, Verizon met all of its installation appointments for CLECs that did not require the dispatch of a Verizon technician and approximately 99 percent of its installation appointments that did require a dispatch. See Lacouture/Ruesterholz NH Decl. ¶ 396. In Delaware, during that same period, Verizon also met all of the installation appointments that did not require a dispatch, and approximately 97 percent its installation appointments that did require a dispatch. See Lacouture/Ruesterholz DE Decl. ¶ 384. Verizon's performance from February through April also was as at similarly high levels in both Massachusetts and Pennsylvania, where volumes are higher. See Lacouture/Ruesterholz NH Decl. ¶ 397; Lacouture/Ruesterholz DE Decl. ¶ 385. Moreover, in all four states, Verizon's performance for CLECs has consistently been equal to or better than Verizon's performance for the retail comparison group. See Lacouture/Ruesterholz NH Decl. ¶¶ 396-397; Lacouture/Ruesterholz DE Decl. ¶¶ 384-385.

Verizon's installation quality on resold lines also is comparable to or better than the performance that Verizon provides for retail customers. This is true both in New Hampshire and in Delaware, and in Massachusetts and Pennsylvania where volumes are higher. See Lacouture/Ruesterholz NH Decl. ¶¶ 399-400; Lacouture/Ruesterholz DE Decl. ¶¶ 387-388. And on the very small percentage of resold lines that experience troubles in those four states, Verizon repairs them in a timely and nondiscriminatory manner. See Lacouture/Ruesterholz NH Decl. ¶¶ 403-410; Lacouture/Ruesterholz DE Decl. ¶¶ 391-398.

Resellers in New Hampshire and Delaware may resell any of Verizon's customer-specific pricing arrangements ("CSPs") to any customer (or customers) meeting the terms and conditions of that particular arrangement. See Lacouture/Ruesterholz NH Decl. ¶ 390; Lacouture/Ruesterholz DE Decl. ¶ 378. While a customer that elects to terminate its service with Verizon may be subject to reasonable and nondiscriminatory termination liabilities to the extent they were part of the original terms of the CSP agreed to by the customer, see Lacouture/Ruesterholz NH Decl. ¶ 392; Lacouture/Ruesterholz DE Decl. ¶ 380, the Commission has held that this is not "unreasonable or discriminatory." New York Order ¶ 390.

Moreover, Verizon offers for resale at a wholesale discount those DSL services that are subject to a discount under the Commission's rules. See Lacouture/Ruesterholz NH Decl. ¶¶ 411-412; Lacouture/Ruesterholz DE Decl. ¶¶ 399-400. Verizon makes available in New Hampshire and Delaware the same "DSL Over Resold Lines" service that Verizon provides in Pennsylvania, Connecticut, Rhode Island, Vermont, and Maine, see Lacouture/Ruesterholz NH Decl. ¶¶ 411-412; Lacouture/Ruesterholz DE Decl. ¶¶ 399-400, where the Commission found that Verizon's offering satisfies the requirements of the Act, see Pennsylvania Order ¶ 95; Connecticut Order ¶ 27; Rhode Island Order ¶ 95; Vermont Order ¶ 59; Maine Order ¶ 52; see also New Jersey Order ¶ 161.⁶⁴ Verizon uses the same checklist-compliant processes and procedures to provide this new service as it uses in those five states. See Lacouture/Ruesterholz NH Decl. ¶ 411; Lacouture/Ruesterholz DE Decl. ¶ 399. And, based on experience throughout Verizon's region, Verizon will be able to handle whatever limited demand can reasonably be

⁶⁴ CLECs that choose to order DSL for resale in New Hampshire and Delaware do so in the same way, and using the same interfaces, that Verizon's ISP customers do. See McLean/Wierzbicki/Webster NH/DE Decl. Att. 2; McLean/Wierzbicki/Webster DE Decl. Att. 2.

expected to emerge for this new service. See Lacouture/Ruesterholz NH Decl. ¶ 412; Lacouture/Ruesterholz DE Decl. ¶ 400.

L. Operations Support Systems.

Verizon provides CLECs operating in New Hampshire and Delaware with access to various checklist items through the same operations support systems that are in place, operational, fully tested, and already handling large commercial volumes.

New Hampshire. Verizon provides CLECS operating in New Hampshire with access to the various checklist items through the same OSS that serve the New England states, see McLean/Wierzbicki/Webster NH/DE Decl. ¶¶ 7-9, which this Commission on four previous occasions has found satisfy the requirements of the Act in all respects. See Massachusetts Order ¶¶ 50, 70, 90, 95, 97, 102, 114; Rhode Island Order ¶¶ 58-71; Vermont Order ¶ 39; Maine Order ¶ 35; see also Kansas/Oklahoma Order ¶ 111 (finding that two different states may “share the use of a single OSS . . . : a common set of processes, business rules, interfaces, systems”). For example, Verizon provides CLECs in New Hampshire with access to the same interfaces, gateway systems, and underlying OSS used in Massachusetts, Rhode Island, and Vermont for pre-ordering, ordering, provisioning, maintenance and repair, and billing. See McLean/Wierzbicki/Webster NH/DE Decl. ¶¶ 8, 13-15. Verizon provisions orders for CLECs in New Hampshire using the same processes and procedures — and from the same work centers — as in Massachusetts, Rhode Island, Vermont, and Maine. See id. Verizon also provides competing carriers in the New England states with the exact same technical support, including the exact same change management process, to help them use Verizon’s OSS. See id. ¶ 9. Moreover, PwC, KPMG, and the Commission have concluded that Verizon’s systems in Massachusetts are the same as those used throughout its New England region, including in New Hampshire. See id. ¶¶ 11, 17-18; Guerard/Canny/Abesamis/DeVito Decl. ¶¶ 91-93; Rhode

Island Order ¶ 60 (“We conclude that Verizon, through the PwC report, its declaratory evidence, and the KPMG report, demonstrates that the OSS in Massachusetts are the same as the OSS in Rhode Island.”); Vermont Order ¶ 40 (finding that “the PwC report and its declarations, provides evidence that its OSS in Massachusetts are substantially the same as the OSS in Vermont and, therefore, evidence concerning its OSS in Massachusetts is relevant and should be considered in our evaluation of Verizon’s OSS in Vermont.”); Maine Order ¶ 36; see also Kansas/Oklahoma Order ¶¶ 3, 107 n.303 (relying on comparable “sameness” test).

As the Commission has found, these systems already were subject to an “independent, third-party test,” conducted by KPMG in support of Verizon’s Massachusetts application, that was “broad in scope,” employed a “military-style test standard,” and provides “persuasive evidence of Verizon’s OSS readiness.” Massachusetts Order ¶¶ 44-46; see Rhode Island Order ¶ 59. They also were subject to an exhaustive examination by the Massachusetts DTE, the Rhode Island PUC, and the Vermont PSB, all of which concluded that Verizon’s systems comply fully with the checklist. See Massachusetts Order ¶ 8; Rhode Island Order ¶ 5; Vermont Order ¶ 3, 5-6. And, of course, this Commission reached the very same conclusion. See Massachusetts Order ¶¶ 50, 70, 90, 95, 97, 102, 114; Rhode Island Order ¶¶ 58-71; Vermont Order ¶¶ 39-43; Maine Order ¶¶ 35-41.

These conclusions are obviously correct today as well. As was the case at the time of Verizon’s previously approved applications, Verizon’s systems are successfully handling large commercial volumes. For example, Verizon’s pre-ordering systems processed more than 29 million transactions across the former Bell Atlantic footprint in 2001, including more than 300,000 in New Hampshire alone. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 33; compare New York Order ¶ 150 (average of 185,000 pre-order transactions per month from

January through July 1999). Verizon's ordering systems processed more than 1.1 million LSRs in 2001 in New England, including more than 100,000 in New Hampshire. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 53. From January through April 2002, Verizon processed more than 8.9 million pre-order transactions in the former Bell Atlantic footprint, including more than 97,000 such transactions in New Hampshire alone. See id. ¶ 33. And during that same period, Verizon's ordering systems processed more than 388,000 LSRs in New England, and more than two million LSRs in New York and New England combined. See id. ¶ 53.

Delaware. Verizon provides CLECS operating in Delaware with access to the various checklist items through the same OSS that serve Pennsylvania, see McLean/Wierzbicki/Webster DE Decl. ¶¶ 7-9, which this Commission has found satisfy the requirements of the Act in all respects. See Pennsylvania Order ¶ 11-12; see also Kansas/Oklahoma Order ¶ 111. For example, Verizon provides CLECs in Delaware with access to the same interfaces, gateway systems, and underlying OSS used in Pennsylvania for pre-ordering, ordering, provisioning, maintenance and repair, and billing. See McLean/Wierzbicki/Webster DE Decl. ¶¶ 8, 13-15. The interfaces and gateway systems in Delaware and Pennsylvania are also the same as those used throughout the New England states — and throughout the former Bell Atlantic footprint — which, as described above, the Commission has repeatedly approved. See id. Verizon provisions orders for CLECs in Delaware using the same processes and procedures — and from the same work centers — as in Pennsylvania. See id. Verizon also provides competing carriers in Delaware with the exact same technical support as in Pennsylvania, including the exact same change management process, to help them use Verizon's OSS. See id. ¶ 9.

Verizon's Delaware systems also have been subject to an "independent, third party" test by KPMG that provides further evidence that Verizon's OSS satisfy the Act. Pennsylvania Order ¶ 14. These systems were originally tested at the time of Verizon's Pennsylvania Application under the auspices of the Pennsylvania PUC and Verizon passed with flying colors. See McLean/Wierzbicki/Webster DE Decl. ¶¶ 17-18. And PwC has recently found that Verizon's systems in Delaware are the same as those used in Pennsylvania. See id. ¶ 11; see also Rhode Island Order ¶ 60 (relying on similar attestation by PwC); Vermont Order ¶ 40 (same); Kansas/Oklahoma Order ¶¶ 3, 107 n.303.

Moreover, the Commission's previous conclusions remain equally true today. As was the case at the time of the Pennsylvania application, Verizon's systems are successfully handling large commercial volumes. For example, as noted above, Verizon's pre-ordering systems processed more than 29 million transactions across the former Bell Atlantic footprint in 2001, including more than 162,000 in Delaware alone. See McLean/Wierzbicki/Webster DE Decl. ¶ 33. And, in 2001, Verizon's ordering systems processed more than 1.8 million LSRs in Pennsylvania and more than 43,000 in Delaware. See McLean/Wierzbicki/Webster DE Decl. ¶ 53. From January through April 2002, Verizon processed more than 8.9 million pre-order transactions in the former Bell Atlantic footprint, including more than 71,000 such transactions in Delaware alone. See id. ¶ 33. And during that same period, Verizon's ordering systems processed more than 539,000 LSRs in Pennsylvania and more than 20,700 in Delaware. See id. ¶ 53. As discussed below, Verizon also has taken steps to address the concerns regarding Verizon's billing systems that were the primary issue at the time of the Pennsylvania application.

1. Pre-Ordering.

Verizon provides CLECs in New Hampshire and in Delaware with the same three electronic pre-ordering interfaces that it does in its 271-approved states and throughout the

former Bell Atlantic service areas. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 19; McLean/Wierzbicki/Webster DE Decl. ¶ 19. The first is a Web GUI that can be used with a personal computer. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 22; McLean/Wierzbicki/Webster DE Decl. ¶ 22. The second is an application-to-application interface based on the industry standard Electronic Data Interchange (“EDI”) protocol. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 22; McLean/Wierzbicki/Webster DE Decl. ¶ 22. Verizon currently offers two industry-standard versions of the Local Service Ordering Guidelines (“LSOG”) for each of the pre-ordering interfaces: LSOG 4 and LSOG 5. LSOG 4 was in place in Massachusetts, Connecticut, Pennsylvania, and Rhode Island when the Commission approved Verizon’s applications for those states; LSOG 5 is the latest adopted version of these standards and guidelines and was in place in Rhode Island, Vermont, Maine, and New Jersey when the Commission approved Verizon’s application in those states. See McLean/Wierzbicki/Webster NH/DE Decl. ¶¶ 23-24; McLean/Wierzbicki/Webster DE Decl. ¶¶ 23-24.⁶⁵ The third is another application-to-application interface known as Common Object Request Broker Architecture (“CORBA”). See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 22; McLean/Wierzbicki/Webster DE Decl. ¶ 22. CLECs are using all three interfaces to submit pre-

⁶⁵ As Verizon has explained in previous applications, Verizon implemented this new standard pursuant to the change management process originally developed in New York and now applied throughout the former Bell Atlantic region. This process incorporated input from CLECs and enabled them to test the release before it was implemented in production. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 24; McLean/Wierzbicki/Webster DE Decl. ¶ 24. Because Verizon supports two versions of a pre-ordering interface, as specified in the change management process, CLECs can make the transition to new versions on a schedule that is convenient for them within a reasonable time frame. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 25; McLean/Wierzbicki/Webster DE Decl. ¶ 25.

ordering transactions both in New Hampshire and in Delaware. See

McLean/Wierzbicki/Webster NH/DE Decl. ¶ 22; McLean/Wierzbicki/Webster DE Decl. ¶ 22.⁶⁶

Verizon's pre-ordering interfaces, which are the same throughout the former Bell Atlantic service areas, already handle large commercial volumes. For example, in 2001, Verizon processed more than 29 million pre-ordering transactions across the former Bell Atlantic footprint, including more than 300,000 in New Hampshire and more than 162,000 in Delaware.

See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 33; McLean/Wierzbicki/Webster DE Decl.

¶ 33. From January through April 2002, Verizon processed another 97,200 pre-ordering transactions in New Hampshire, and another 71,000 such transactions in Delaware. See

McLean/Wierzbicki/Webster NH/DE Decl. ¶ 33; McLean/Wierzbicki/Webster DE Decl. ¶ 33.

Even at these large and increasing volumes, the performance of Verizon's pre-ordering systems has remained excellent. From February through April, Verizon generally met the response-time standards for all types of pre-ordering transactions both in New Hampshire and in Delaware, including the separate standards for providing "parsed" Customer Service Records.

See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 35; McLean/Wierzbicki/Webster DE Decl.

¶ 35; Massachusetts Order ¶ 53 & n.155. Moreover, from February through April, Verizon's EDI, CORBA, and Web GUI pre-ordering interfaces met the 99.5-percent availability standard

in both states in at least two of the three months. See McLean/Wierzbicki/Webster NH/DE Decl.

¶ 35; McLean/Wierzbicki/Webster DE Decl. ¶ 35; Massachusetts Order ¶ 53 & n.154.

⁶⁶ CLECs can integrate Verizon's pre-ordering EDI and CORBA interfaces with their own back-end systems and with Verizon's EDI ordering interface. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 28; McLean/Wierzbicki/Webster DE Decl. ¶ 28; Massachusetts Order ¶ 52; New York Order ¶¶ 137-138.

2. Ordering.

Verizon provides CLECs serving end users in New Hampshire and Delaware with the same two electronic ordering interfaces that it provides in its 271-approved states, both of which are currently used by CLECs in New Hampshire and Delaware. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 45; McLean/Wierzbicki/Webster DE Decl. ¶ 45. The first is the same Web GUI that is available for pre-ordering. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 46; McLean/Wierzbicki/Webster DE Decl. ¶ 46; Massachusetts Order ¶ 74. The second is an EDI ordering interface. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 46; McLean/Wierzbicki/Webster DE Decl. ¶ 46; Massachusetts Order ¶ 74. Like the pre-ordering EDI interface, the ordering EDI interface is available in two versions: LSOG 4 (which was in place when Verizon's Massachusetts, Pennsylvania, Rhode Island, Vermont, Maine, New Jersey, New York, and Connecticut applications were approved) and LSOG 5 (which is based on the latest adopted standards and was in place when Verizon's Rhode Island, Vermont, Maine, and New Jersey applications were approved). See McLean/Wierzbicki/Webster NH/DE Decl. ¶¶ 47-48; McLean/Wierzbicki/Webster DE Decl. ¶¶ 47-48. The Commission has found that Verizon's ordering interfaces satisfy the requirements of section 271. See, e.g., Massachusetts Order ¶ 70; Pennsylvania Order ¶ 12; Rhode Island Order ¶ 58; Vermont Order ¶ 39; Maine Order ¶ 35; New Jersey Order ¶ 74.

Verizon's ordering interfaces are handling commercial volumes. In 2001, Verizon processed more than 108,000 LSRs in New Hampshire, more than 43,000 in Delaware, more than 1.1 million in New England as a whole, more than 1.8 million in Pennsylvania, and more than 10.3 million in the former Bell Atlantic states as a whole. See McLean/Wierzbicki/Webster

NH/DE Decl. ¶ 53; McLean/Wierzbicki/Webster DE Decl. ¶ 53.⁶⁷ From January through April 2002, Verizon processed more than 36,000 LSRs in New Hampshire, more than 20,700 in Delaware, more than 388,000 in New England, more than two million in New York and New England combined, more than 539,000 in Pennsylvania, and more than 3.2 million in the former Bell Atlantic states as a whole. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 53; McLean/Wierzbicki/Webster DE Decl. ¶ 53.

Even at these large and increasing volumes, Verizon performs the various ordering functions on a timely basis. From February through April 2002, Verizon's on-time performance for returning confirmation, reject, and completion notifiers generally exceeded the 95-percent benchmark for both UNE and resale orders, and across almost all order-type subcategories, both in New Hampshire and in Delaware. See McLean/Wierzbicki/Webster NH/DE Decl. ¶¶ 66-67, 77-78; McLean/Wierzbicki/Webster DE Decl. ¶¶ 66-67, 77-79; Rhode Island Order ¶ 66. These are substantially the same "strict benchmark standards" that apply to Verizon's performance in Massachusetts, New York, and Pennsylvania. New York Order ¶¶ 164, 180; see Massachusetts Order ¶ 71; Pennsylvania Order ¶ 3. Verizon also processes orders accurately, as evidenced by its performance on the Service Order Accuracy measurements. From February through April, Verizon's order accuracy performance both in New Hampshire and Delaware exceeded 90 percent for all measurements, and for most measurements its performance was above 95 percent. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 68; McLean/Wierzbicki/Webster DE Decl. ¶ 68. Overall, these results are better than, or comparable to, Verizon's results in Massachusetts,

⁶⁷ As part of its OSS tests in Massachusetts and Pennsylvania, KPMG also tested Verizon's ability to process normal, peak, and stress order volumes, and found that Verizon satisfied all of the test criteria. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 53; McLean/Wierzbicki/Webster DE Decl. ¶ 53; KPMG MA Report at 47-60, 100-06; KPMG PA Report at 281-97; Massachusetts Order ¶ 81.

Rhode Island, and Pennsylvania at the time the Commission approved Verizon's applications in those states. See id.; Massachusetts Order ¶ 81 & n.251; Rhode Island Order App. B; Pennsylvania Order ¶ 49 & n.190.

Verizon's OSS also are capable of "flowing through" a large percentage of CLEC orders. Indeed, Verizon's total flow-through results in New Hampshire and Delaware are comparable to those at the time of Verizon's Massachusetts and New York applications. See Guerard/Canny/Abesamis/DeVito Decl. Atts. 1 & 2 (OR-5-01-2000, OR-5-01-3000). Verizon's achieved flow-through rate for all modes of entry also is high in New Hampshire, where it has ranged from 90 to 95 percent or more from February through April. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 60; Guerard/Canny/Abesamis/DeVito Decl. ¶ 54 (Verizon does not report achieved flow through in Delaware or Pennsylvania); Pennsylvania Order ¶ 48 ("we do not specifically require Verizon to provide data on its achieved flow-through rate to determine that Verizon's OSS are capable of offering high flow-through") (footnote omitted).⁶⁸ Of course, as in Verizon's 271-approved states, the total flow-through rates in New Hampshire and Delaware continue to vary by carrier, demonstrating that Verizon's systems are significantly better than the aggregated results suggest on their face. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 59; McLean/Wierzbicki/Webster DE Decl. ¶ 59; Massachusetts Order ¶ 78; New York Order ¶ 166. And, as the Commission has recognized, the "conclusion that Verizon's systems are capable of achieving high overall levels of order flow-through is reinforced by KPMG's testing." in which KPMG "achieved a flow-through rate of 100 percent." Massachusetts Order ¶ 78; accord Pennsylvania Order ¶ 49.

⁶⁸ The Achieved Flow Through measurements track the percentage of orders that are capable of flowing through that actually do flow through. See Guerard/Canny/Abesamis/DeVito Decl. ¶ 53.

Finally, Verizon's performance in returning order status notifiers to CLECs is strong, both in New Hampshire and in Delaware. From February through April, Verizon consistently, with a few minor exceptions, exceeded the 95-percent benchmark for returning provisioning and billing completion notifiers on time, both in New Hampshire and in Delaware. See McLean/Wierzbicki/Webster NH/DE Decl. ¶¶ 77-78; McLean/Wierzbicki/Webster DE Decl. ¶¶ 77, 79; Massachusetts Order ¶ 84; Rhode Island Order ¶ 66. Verizon also has two methods for informing CLECs of orders that are in jeopardy, which are the same methods that it provided at the time the Commission approved Verizon's Massachusetts, Pennsylvania, Rhode Island, Vermont, and Maine applications. See McLean/Wierzbicki/Webster NH/DE Decl. ¶¶ 69, 74; McLean/Wierzbicki/Webster DE Decl. ¶¶ 69, 74; Massachusetts Order ¶ 85; Pennsylvania Order ¶ 50; Rhode Island Order ¶¶ 67-68.

3. Provisioning.

Verizon provisions CLEC orders in New Hampshire and Delaware on a nondiscriminatory basis. In New Hampshire, Verizon uses the same provisioning systems and processes as in Massachusetts, Rhode Island, Vermont, and Maine. See McLean/Wierzbicki/Webster NH/DE Decl. ¶¶ 79-81. In Delaware, Verizon uses the same provisioning systems and processes as in Pennsylvania. See McLean/Wierzbicki/Webster DE Decl. ¶¶ 80-82. The Commission has found that these systems satisfy the requirements of the Act in all respects. See Massachusetts Order ¶ 90; Pennsylvania Order ¶ 11; Rhode Island Order ¶ 69-70; Vermont Order ¶ 43; Maine Order ¶ 35.

As in the other states for which Verizon has received section 271 authorization, there are no separate provisioning interfaces because provisioning is essentially internal to Verizon once an order is submitted. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 79; McLean/Wierzbicki/Webster DE Decl. ¶ 80. Indeed, the systems and processes for most CLEC

orders are the same as those used to provision Verizon's retail orders. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 81; McLean/Wierzbicki/Webster DE Decl. ¶ 82. As the Commission has concluded, these systems "provide[] parity in provisioning competitors' orders as compared to [Verizon's] retail orders." Massachusetts Order ¶ 90; see Pennsylvania Order ¶ 11; Rhode Island Order ¶ 69; see also New York Order ¶¶ 193, 197.

4. Maintenance and Repair.

Verizon provides CLECs in New Hampshire and in Delaware with access to the same two maintenance and repair interfaces that it provides in its 271-approved states and the rest of the former Bell Atlantic service areas: the Web GUI and an electronic bonding interface. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 83; McLean/Wierzbicki/Webster DE Decl. ¶ 84. The Web GUI provides "a requesting carrier . . . access [to] all the same functions that are available to [Verizon's] retail representatives." New York Order ¶ 213. The Electronic Bonding Interface ("EBI") is an application-to-application interface that allows CLECs to connect directly to Verizon's maintenance and repair OSS. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 86; McLean/Wierzbicki/Webster DE Decl. ¶ 87. As the Commission previously found, these interfaces "flow directly into Verizon's back-end OSS and enable competing carriers to perform the same functions, in the same manner, as Verizon's retail operations." Massachusetts Order ¶ 95. From February through April, 16 CLECs in New Hampshire used the Web GUI and one CLEC used the EBI for maintenance and repair. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 84. As of that same date, 14 CLECs in Delaware used the Web GUI and two used the EBI. See McLean/Wierzbicki/Webster DE Decl. ¶ 85.

Competing carriers in New Hampshire and Delaware already use Verizon's maintenance and repair interfaces in commercially significant volumes. For example, from February through April, CLECs used RETAS — the maintenance and repair system accessed by the Web GUI

throughout the former Bell Atlantic footprint — to perform approximately 130,000 maintenance and repair transactions per month across the former Bell Atlantic footprint, including approximately 510 maintenance transactions per month in New Hampshire and approximately 170 per month in Delaware. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 92; McLean/Wierzbicki/Webster DE Decl. ¶ 93.

Verizon's maintenance and repair systems also process trouble reports from CLECs in substantially the same time and manner as Verizon processes reports for its own retail customers. From February through April, Verizon consistently exceeded the established standards for responding to virtually all types of maintenance and repair requests that CLECs submitted using the Web GUI in New Hampshire. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 93; see also Massachusetts Order ¶ 96 (relying on comparable or lesser performance); New York Order ¶ 219 (same). Moreover, the Commission found that KPMG's test in Massachusetts "confirms the satisfactory performance demonstrated by Verizon's performance data." Massachusetts Order ¶ 95. And in Pennsylvania, Verizon satisfied each of the test criteria related to maintenance and repair in the examination conducted by KPMG, which concluded that Verizon "shows very good results in M&R [maintenance and repair]." Verizon Pennsylvania, Inc. OSS Evaluation Project, Draft Final Report Workshops, Transcript at 347, Docket No. M-00991228 (Pa. PUC Dec. 8, 2000); McLean/Wierzbicki/Webster DE Decl. ¶ 93. And, because the New Hampshire and Delaware systems are the same as those in Massachusetts and Pennsylvania, respectively, the same conclusions apply here as well.

5. Billing.

Verizon uses the New England systems to generate billing information in New Hampshire, and the Pennsylvania systems to generate billing information in Delaware. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 95; McLean/Wierzbicki/Webster DE Decl. ¶ 95.

These are the same systems that Verizon uses for its own retail operations in all of these states.

See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 95; McLean/Wierzbicki/Webster DE Decl.

¶ 95.⁶⁹

The Commission found that the New England systems provide “nondiscriminatory access to [Verizon’s] billing functions” by providing “competing carriers with [Daily Usage Files] in substantially the same time and manner that Verizon provides such information to itself, and carrier bills in a manner that gives competing carriers a meaningful opportunity to compete.”

Massachusetts Order ¶¶ 97-98; see Rhode Island Order ¶ 71; Vermont Order ¶ 42; Maine Order

¶ 41. The Commission also found that Verizon “provides non-discriminatory access to its OSS billing functions,” in Pennsylvania. Pennsylvania Order ¶ 41. Moreover, KPMG has found “Verizon’s billing system to be accurate and reliable” in Verizon’s New England states.

Massachusetts Order ¶ 98; see also Rhode Island Order ¶ 71. And, in Pennsylvania, KPMG found that Verizon’s billing systems in Pennsylvania “had satisfied all test points.” Pennsylvania Order ¶ 31. Those conclusion accordingly apply here as well.

The New England billing systems used in New Hampshire, like those in New York, have long made available to CLECs electronic carrier bills in the Billing Output Specification (“BOS”) Bill Data Tape (“BDT”) format. See McLean/Wierzbicki/Webster NH/DE Decl. ¶¶ 98, 102. Accordingly, as the Commission has found, the billing systems here raise none of the same issues that arose in connection with Verizon’s application in Pennsylvania. See Rhode Island Order ¶ 71 & n.198 (noting that, in the Pennsylvania 271 proceeding, “the Verizon Massachusetts billing system[] was applauded”). Moreover, only two CLECs complained about

⁶⁹ Verizon’s billing systems produce an average of more than 89 million call records (i.e., Exchange Message Interface (“EMI”) records) each month in New England and more than 110 million EMI records each month in Delaware and Pennsylvania. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 96; McLean/Wierzbicki/Webster DE Decl. ¶ 99.

the quality of their BOS-BDT bills in the section 271 proceedings in New Hampshire, and their complaints were minor, were not based on current data, and were incorrect. See McLean/Wierzbicki/Webster NH/DE Decl. ¶¶ 103-105.

With respect to the Pennsylvania billing systems used in Delaware, Verizon has fully resolved the issues relating to its provision of bills in the BOS-BDT format. The Hearing Examiner in Delaware originally found that “Verizon-DE has made changes that will address the billing problems” that were experienced “in other states,” and that “it is likely that, by the time the FCC reviews Verizon-DE’s filing, the company will be providing bills that are sufficiently accurate and auditable.” Delaware Hearing Examiner Report ¶¶ 45-46. The Hearing Examiner accordingly recommended that the PSC “condition a finding of compliance with the checklist . . . on a definitive report forthcoming from Verizon-DE showing the effectiveness of recent corrective changes that have already been instituted.” Id. ¶ 46. Pursuant to that recommendation, Verizon filed a report with the PSC on June 17, 2002, demonstrating that the enhancements to Verizon’s billing systems have been effectively implemented for the state of Delaware. See Letter from Julia A. Conover, Verizon Delaware, to Karen Nickerson, Delaware PSC, Docket No. 02-001 (June 17, 2002) (App. B-NH, Tab 18). And based on that report, the PSC has concluded that “the billing issues are being addressed.” Transcript of PSC Approval at 100.

The performance data in New Hampshire and Delaware demonstrate that Verizon continues to deliver timely and accurate bills to CLECs.⁷⁰ For example, from February through

⁷⁰ In the Rhode Island sameness test, KPMG also conducted a stand-alone test of Verizon’s line-loss reports, which identify for CLECs the end-user lines that have migrated from one local service provider to another. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 108. KPMG confirmed that Verizon’s line-loss reports are accurate. See id. Indeed, the number of telephone numbers reported by CLECs as either inaccurate in the line-loss reports or missing

April, Verizon consistently exceeded the 95-percent on-time standard for providing customer-usage data and the 98-percent on-time standard for providing wholesale bills to competing carriers in New Hampshire and Delaware. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 99; McLean/Wierzbicki/Webster DE Decl. ¶ 107. Verizon also had very few billing adjustments for CLECs from February through April both in New Hampshire and in Delaware. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 100; McLean/Wierzbicki/Webster DE Decl. ¶ 108.

Because the billing systems for Pennsylvania and Delaware are the same, the work that Verizon did in 2001 to improve its carrier billing in Pennsylvania has virtually eliminated in Delaware the principal areas of CLEC concern expressed in Pennsylvania. CLECs inform Verizon of issues with their bills in two ways. First, for electronic bills, CLECs report problems by submitting a trouble ticket to a help desk. See McLean/Wierzbicki/Webster DE Decl. ¶ 104. For the one-year period ending in April 2002, CLECs opened only 26 trouble tickets in Delaware, none of which required a system fix by Verizon. See id. Second, CLECs inform Verizon of errors on their bills (whether electronic or paper) by submitting claims that dispute charges on the bill. See id. ¶ 105. During the Pennsylvania proceeding, CLECs raised concerns about four different types of charges; however, during the first four months of this year, all CLEC claims in Delaware relating to these four areas amounted to less than \$3,000. See id. Finally, the total amount of all Delaware billing claims submitted by CLECs from October 2001 (the first month following the Commission's approval of Verizon's 271 application for Pennsylvania) through April 2002 was only 2.7 percent of total current charges billed to CLECs

from those reports in both New Hampshire and Delaware averaged less than 1 percent in 2001 and 2002. See id. ¶ 107; McLean/Wierzbicki/Webster DE Decl. ¶ 117; see also Pennsylvania Order ¶ 52 (finding that Verizon satisfies the checklist where the percentage of working telephone numbers reported as missing or incorrect averaged less than 1 percent).

during this time frame. See id. ¶ 106. And, these are all disputes *submitted* by CLECs, irrespective of whether Verizon agrees with the claim. See id.

6. Technical Support and Change Management.

Verizon provides CLECs in New Hampshire and Delaware with the same support mechanisms and processes that it provides in its 271-approved states and throughout the former Bell Atlantic service areas. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 109; McLean/Wierzbicki/Webster DE Decl. ¶ 118. The Commission has repeatedly found that these mechanisms and processes satisfy the checklist. See Massachusetts Order ¶ 102; Pennsylvania Order ¶¶ 12, 51; Rhode Island Order ¶ 1; Vermont Order ¶ 1; Maine Order ¶ 1; Connecticut Order ¶ 1; New York Order ¶ 101. Moreover, KPMG has examined Verizon's procedures for establishing and maintaining relationships with CLECs in Massachusetts and Pennsylvania and found them satisfactory in all respects. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 110; KPMG MA Report at 495-629; KPMG PA Report at 21-154.

First, Verizon provides CLECs doing business in New Hampshire and Delaware with the same extensive information, training, and assistance as it provides to CLECs in its 271-approved states. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 128. This includes handbooks, technical documentation that Verizon frequently updates and supplements, and numerous training sessions. See id. ¶¶ 128-131. In addition, Verizon offers CLECs in New Hampshire and Delaware access to the same well-staffed Help Desk that is used by CLECs in Verizon's 271-approved states, and New York, and that provides a single point of contact for a wide variety of problems that CLECs may encounter. See id. ¶¶ 134-139; see also Massachusetts Order ¶ 114 (finding that Verizon "provides the technical assistance and help desk support necessary to give competing carriers nondiscriminatory access to its OSS"); New York Order ¶ 127 (finding that

Verizon's training and assistance "provides efficient competitors a meaningful opportunity to compete").

Second, Verizon has adopted the same change management process in New Hampshire and Delaware that it uses across the former Bell Atlantic footprint. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 111; see also Massachusetts Order ¶¶ 102-113 (approving Verizon's change management process); Pennsylvania Order ¶ 51 (same); New York Order ¶¶ 111-112 (same). As in those states, Verizon provides CLECs in New Hampshire "with timely change management notification and documentation." New York Order ¶ 114; see Massachusetts Order ¶ 104. In fact, from February through April, Verizon met the change management on-time standards for 100 percent of the change confirmations and notifications made during that period. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 119; see also Massachusetts Order ¶ 105 (relying on comparable performance); New York Order ¶ 114 (same). In addition, KPMG has examined the change management process in Massachusetts and Pennsylvania and found it satisfactory in all respects. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 119; Massachusetts Order ¶ 106.

Finally, Verizon provides CLECs in New Hampshire and Delaware with the same testing environment offered to CLECs in Verizon's 271-approved states, which allows all competing carriers to test the interaction of their systems and interfaces with Verizon's pre-ordering and ordering interfaces and OSS. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 121; Massachusetts Order ¶ 109 (approving the same testing environment); Pennsylvania Order ¶ 12. Moreover, KPMG conducted an extensive review of the CLEC test environment and test procedures in Massachusetts and Pennsylvania, and found that Verizon satisfies every test criterion. See McLean/Wierzbicki/Webster NH/DE Decl. ¶ 127; KPMG MA Report at 526-39;

KPMG PA Report at 92-98; Massachusetts Order ¶ 111 (relying in part on similar KPMG finding).

III. VERIZON IS FULLY IN COMPLIANCE WITH THE REQUIREMENTS OF SECTION 272.

As in the other states in which Verizon has received section 271 approval, Verizon will provide all services that are subject to the requirements of section 272 through one or more separate affiliates (collectively, the “272 Affiliates”) that comply fully with the requirements of that section and the Commission’s rules.⁷¹ The Commission found in each of those previously approved states that Verizon “demonstrated that it will comply with the requirements of section 272.” New York Order ¶ 403; Massachusetts Order ¶ 227; Pennsylvania Order ¶ 124; Rhode Island Order ¶ 101; Vermont Order ¶ 60; Maine Order ¶ 56; New Jersey Order ¶ 165; Connecticut Order ¶ 73. Those findings apply equally here.⁷²

⁷¹ As required by the Act, the services that will be provided through the 272 Affiliates include any interLATA services originating in New Hampshire or Delaware that are covered by section 272(a)(2)(B). Under section 271(j), private line and 800 services receive unique treatment for these purposes: any such services that terminate in New Hampshire or Delaware are deemed to originate there, while such services that originate in New Hampshire or Delaware are deemed to terminate there. As a result, these types of services are subject to the requirements of sections 271 and 272 on the terminating (rather than the originating) end. While some have claimed that section 271(j) should be construed as an additional restriction, the plain language of that section makes clear that they are incorrect. In reality, section 271(j) reverses the normal presumption and treats the terminating end of 800 and private line services as the originating end — hence, the section 271(j) restriction applies only on the terminating end for these services.

⁷² In addition, the first biennial audit, which was conducted by PwC and completed on June 11, 2001, demonstrated that Verizon’s program for complying with the section 272 requirements is comprehensive and effective. See Browning Decl. ¶¶ 6, 19, 21; Browning PA Decl. ¶¶ 32-34 (App. L-NH, Tab 1; App. J-DE, Tab 1); see also Rhode Island Order ¶ 101 n.319 (“no party cites the audit findings as evidence of noncompliance (or even challenges Verizon’s showing generally”); Vermont Order ¶ 60 (“No party challenges Verizon’s section 272 showing.”); Pennsylvania Order ¶ 124 & n.430; Maine Order ¶ 56; New Jersey Order ¶ 165. Moreover, the Commission has held that “the audit results, standing alone, are insufficient to establish whether Verizon is in compliance with section 272,” and “it would be premature to consider the audit as evidence of shortcomings in Verizon’s section 272 compliance.” New Jersey Order ¶ 165 n.512; see also Maine Order ¶ 56 n.255.